

# **EXHIBIT B1**

INSTRUCTION NO. \_\_\_\_

**I**

The term “negligent” or “negligence” as used in these instructions means the failure to use that degree of skill and learning ordinarily used under the same or similar circumstances by an expert in defendant's business.

**II**

The phrase “ordinary care” as used in these instructions means that degree of care, skill and learning that an ordinarily careful expert in defendant's business would use under the same or similar circumstances.